

The Honorable Theresa L. Frick

FILED	LODGED
RECEIVED	
Apr 13 2023	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,

v.

JEREMY D. REEVES,
Defendant.

NO. 3:23-mj-05144

COMPLAINT for VIOLATION

Title 18, U.S.C.
Sections 1344, 1028A(a)(1)

BEFORE the Honorable Theresa L. Fricke, United States Magistrate Judge, U.S.
Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNTS 1-2

(Bank Fraud)

1. Beginning at a time unknown, and continuing through on or about
December 28, 2022, in Clark County, within the Western District of Washington, and
elsewhere, JEREMY D. REEVES knowingly devised and executed a scheme and artifice
to defraud a financial institution as defined in 18 U.S.C. § 20, and to obtain monies,
funds, and credits under the custody and control of the financial institution by means of
materially false and fraudulent pretenses, representations, and promises, as further and
more particularly set forth below.

1 **A. The Scheme and Artifice to Defraud**

2 2. The essence of the scheme and artifice to defraud was for REEVES to
3 unjustly enrich himself by using identifications belonging to others to open unauthorized
4 accounts and obtain lines of credit at federally-insured financial institutions.

5 3. The scheme and artifice to defraud resulted in at least \$10,000 in actual
6 losses to the financial institutions.

7 4. At all times relevant to the allegations in this Complaint, IQ Credit Union
8 met the definition of a financial institution set forth in Title 18, United States Code,
9 Section 20, because its accounts were insured by the National Credit Union Share
10 Insurance Fund.

11 **B. Manner and Means of the Scheme and Artifice to Defraud**

12 5. It was a part of the scheme and artifice to defraud that REEVES used an
13 identification belonging to Victim 1 to open an unauthorized account and obtain, and
14 attempt to obtain, a line of credit at IQ Credit Union. Victim 1 neither authorized
15 REEVES to open the account and obtain a line of credit in Victim 1's name nor permitted
16 REEVES to use the line of credit.

17 6. It was further part of the scheme and artifice to defraud that REEVES failed
18 to repay the line of credit used, resulting in a loss and a risk of loss to IQ Credit Union at
19 which he fraudulently opened an account in Victim 1's name.

20 **C. Execution of the Scheme and Artifice to Defraud**

21 7. On or about the dates identified below, in Clark County, within the Western
22 District of Washington, and elsewhere, for the purpose of executing and attempting to
23 execute this scheme and artifice to defraud a financial institution, and for the purpose of
24 carrying out and attempting to carry out this scheme and artifice to obtain monies, funds,
25 and credits under the custody and control of the financial institutions by means of
26 materially false and fraudulent pretenses, representations and promises, JEREMY D.
27

REEVES knowingly caused to be conducted the following transactions, with each constituting a separate Count of this Complaint.

COUNT	DATE	FINANCIAL INSTITUTION	TRANSACTION
1	10/20/2022	IQ Credit Union	Opening a credit card account and obtaining a line of credit totaling \$10,000 in Victim 1's name.
2	10/24/2022	IQ Credit Union	Submitting an application for a line of credit totaling \$20,000 in Victim 1's name.

All in violation of Title 18, United States Code, Section 1344.

COUNTS 3-4

(Aggravated Identity Theft)

8. On or about the below dates, in Clark County, within the Western District of Washington, and elsewhere, JEREMY D. REEVES did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person specified below—who is a real person—during and in relation to the specified violations of Title 18, United States Code, Section 1344 that are charged above. These offenses were committed during the course of and in furtherance of the scheme and artifice to defraud charged in Counts 1 and 2.

COUNT	DATE	MEANS OF IDENTIFICATION & RELATED COUNT
3	10/20/2022	Victim 1's name, date of birth, and social security number, an IQ Credit Union account ending in 0485 that REEVES opened without consent in Victim 1's name, and a line of credit that REEVES obtained without consent in Victim 1's name. (charged in Count 1)
4	10/24/2022	Victim 1's name, date of birth, and social security number, and a line of credit that REEVES attempted to obtain without consent in Victim 1's name. (charged in Count 2)

All in violation of Title 18, United States Code, Section 1028A(a)(1).

1 I, Adam L. Sale, being first duly sworn on oath, depose and say:

2 **AFFIANT BACKGROUND**

3 9. I am a Postal Inspector with the United States Postal Inspection Service
4 (USPIS) and have been since July 2014. I am currently assigned to the Portland, Oregon
5 Domicile Office of the USPIS. As a Postal Inspector, I am empowered by 18 U.S.C.
6 § 3061 to conduct investigations and to make arrests for offenses against the United
7 States. As part of my duties, I investigate incidents where the United States mail system
8 is used to facilitate criminal activity to include mail theft, identity theft, bank fraud, wire
9 fraud, access device fraud, and the unlawful mailing of controlled substances. In April
10 2004, I attended the Criminal Investigator Training Program at the Federal Law
11 Enforcement Training Center in Glyncro, Georgia. From April 2004 to July 2014, I served
12 as a U.S. Secret Service Special Agent. Before that, I served eight years in the U.S.
13 Army as a Commissioned Officer, achieving the rank of Captain.

14 **INTRODUCTION AND PURPOSE OF AFFIDAVIT**

15 10. I submit this affidavit in support of a criminal complaint charging JEREMY
16 D. REEVES with bank fraud in violation of 18 U.S.C § 1344 and aggravated identity
17 theft in violation of 18 U.S.C § 1028A(a)(1), and the issuance of an arrest warrant for
18 REEVES. I did not include all the relevant facts known to me or other members of law
19 enforcement regarding this investigation. I set forth in this affidavit only those facts
20 necessary to support probable cause for the requested criminal complaint and arrest
21 warrant.

22 11. The facts set forth in this affidavit are based on my own personal
23 knowledge; knowledge obtained from other individuals during my participation in this
24 investigation, including other law enforcement officers; interviews of witnesses; my
25 review of records related to this investigation; communications with others who have
26 knowledge of the events and circumstances described herein; and information gained
27 through my training and experience.

SUMMARY OF PROBABLE CAUSE

12. On December 28, 2022, U.S. Postal Inspector David Hardin was contacted by Deputy Dan Brown with the Clark County Sheriff's Office (CCSO) regarding an ongoing fraud investigation against JEREMY D. REEVES. Deputy Brown relayed the following information regarding the investigation:

13. In October 2022, REEVES submitted a retail credit application with Les Schwab Tires in Vancouver, Washington, and obtained credit in the amount of \$2,212.55. The credit was used to pay for services rendered to a motorhome that REEVES brought to the store. REEVES used the name S.S. on the credit application and provided S.S.'s Oregon driver's license as identification. REEVES has a passing resemblance to S.S. physically in that they both have red hair and a beard. Surveillance footage from the Les Schwab store shows REEVES inside the store on October 19, 2022. Inspector Hardin determined that it was REEVES, and not S.S., in the surveillance footage based on a photo-identification of REEVES obtained from law enforcement sources.

14. On October 20, 2022, REEVES again used S.S.'s driver's license as identification to open a credit card account with IQ Credit Union in downtown Vancouver and obtain a \$10,000 loan from the credit union. Along with his loan application, he submitted a rental agreement and proof of income in S.S.'s name. Two days later, he withdrew the entire amount from the drive-up ATM of IQ Credit Union's Hazel Dell branch. Surveillance footage captured REEVES at the credit union office on October 20, 2022 and captured him and his vehicle, a bronze Toyota Tundra,¹ at the drive-up ATM on October 22, 2022. Inspector Hardin determined that it was REEVES, and not S.S., in the surveillance footage based on a photo-identification of REEVES obtained from law enforcement sources.

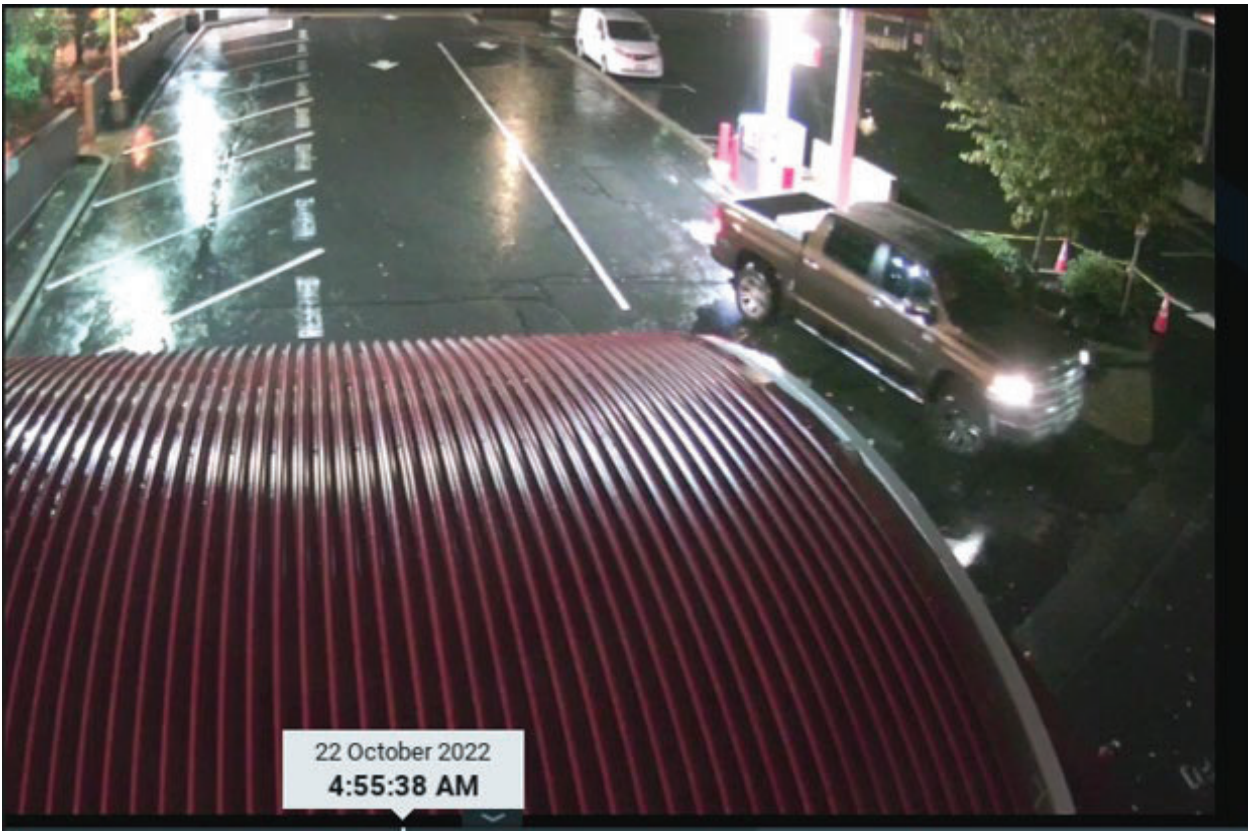
¹ The vehicle's license plate number is 255MVE and the registered owner is C.C.

REEVES at IQ Credit Union, Hazel Dell Branch



//
//
//

REEVES and his Vehicle at Drive-Up ATM



1 15. According to records that IQ Credit Union provided to investigators,
2 REEVES submitted an online application with the credit union on October 24, 2022 for a
3 personal loan in the amount of \$20,000, using S.S.'s name, date of birth, and social
4 security number. The application was denied due to the credit union's internal fraud
5 alerts.

6 16. On November 29, 2022, Deputy Brown was outside a Target store on Hazel
7 Dell Avenue in Vancouver, Washington on an unrelated matter when he spotted a male
8 fitting REEVES's description enter the store. Deputy Brown also noticed a bronze
9 Toyota Tundra parked near where the male walked from. A short time later, the male
10 walked out of the store with a female and they walked toward the bronze Toyota Tundra
11 and got in. Deputy Brown drove around the vehicle and confirmed that it had the same
12 aftermarket chrome rims and toolbox that REEVES's vehicle had when REEVES drove it
13 through IQ Credit Union's drive-up ATM on October 22, 2023, as depicted in IQ Credit
14 Union's surveillance footage.

15 17. Two deputies began following the Tundra as it exited the Target parking
16 lot. As the Tundra began moving north on NE 5th Avenue, one deputy initiated a traffic
17 stop. The Tundra initially came to a stop. But as the deputy got out of her vehicle, the
18 Tundra sped off. The deputies followed the vehicle and observed it committing numerous
19 traffic violations before the deputies lost track of the vehicle.

20 18. On December 28, 2022, investigators obtained law enforcement records on
21 a different investigation involving the Tundra and uncovered an address associated with
22 it. At that address, investigators observed a Lincoln MKZ with REEVES in the driver's
23 seat. When REEVES began driving away, investigators followed him.

24 19. REEVES drove to Chase Bank at 200 NE Hazel Dell Avenue, Vancouver,
25 Washington, and entered the bank. As he exited the bank, investigators arrested him for
26 offenses related to the above conduct.

1 20. Investigators interviewed a Chase Bank manager and confirmed that, on
2 December 28, 2022, REEVES, verbally identifying himself as J.S. to a bank employee,
3 sought to open a line of credit with the bank. The bank employee made an appointment
4 under J.S.'s name for the next day for that purpose.

5 21. Investigators searched REEVES incident to his arrest and found on him (1)
6 a counterfeit Oregon driver's license containing Reeves's photograph but the identifiers
7 of the victim, J.S, (2) a Chase Bank check for \$5,000 payable to J.S., (3) a Washington
8 State Employees Credit Union credit card with J.S.'s name on it, and (4) three other
9 credit cards in three different names.

10 22. A counterfeit United States Postal Service (USPS) key, commonly called
11 an "arrow key," was also recovered on REEVES's person at his arrest. An arrow key is
12 used by USPS to open Neighborhood Delivery Units (NDUs), which are secured
13 mailboxes centralized in residential neighborhoods and business complexes. I know from
14 my training and experience that individuals breach NDUs with counterfeit arrow keys to
15 gain access to the US mail within NDUs. I also know that individuals steal US mail to
16 obtain items of value, such as bank checks that can be altered and fraudulently
17 negotiated, and personal information which can be used to facilitate identity theft.

18 23. Following REEVES's arrest, Inspector Hardin and CCSO deputies
19 interviewed REEVES. After being advised of and stating he understood his *Miranda*
20 rights, REEVES admitted using a counterfeit arrow key to access NDUs and stealing mail
21 from them. REEVES stated that he used Personal Identifying Information (PII) found in
22 stolen mail to commit identity theft. REEVES also admitted receiving stolen mail and PII
23 from an individual named B.C. B.C. was the target of a USPIS Portland fraud
24 investigation from 2020 to 2022 culminating in his federal arrest in August 2022 for
25 Aggravated Identity Theft and Access Device Fraud in the District of Oregon.

26 24. Investigators checked the temporary license plate number on the Lincoln
27 MKZ that REEVES was driving at the time of his arrest, and confirmed that it was

1 registered to J.S. The vehicle's VIN number, however, was registered to a different
2 individual. Investigators contacted that individual, who stated that he had traded in the
3 vehicle at the Harris Ford-Lincoln car dealership. Investigators learned from the
4 dealership that REEVES purchased the Lincoln MKZ there using a pre-approved bank
5 loan in J.S.'s name for \$59,739. The dealership provided the documents that REEVES
6 submitted for the purchase: the vehicle buyer's order and retail installment sale contract
7 that contained J.S.'s name, and a photocopy of J.S.'s forged driver's license that Reeves
8 had on his person at his arrest.

9 25. On December 30, 2022, CCSO investigators executed a search warrant on
10 the Lincoln MKZ and found (1) two forged Oregon driver's licenses containing a photo
11 of REEVES but the identifiers of other Oregon residents, and (2) a Washington driver's
12 license belonging to an individual in Camas, Washington who had similar physical
13 characteristics as REEVES: red hair and a beard. Inside the vehicle's trunk, investigators
14 found various items implicating REEVES in an identity-theft operation, such as a credit
15 card scanner, credit card embosser, check books, Wi-Fi network manipulator, electronic
16 vehicle license plate flipper, and multiple forged driver's licenses and legitimate driver's
17 licenses belonging to others.

18 26. Investigators contacted the victims S.S. and J.S. and confirmed that the
19 victims did not authorize REEVES to use their names or identifications in any way.

20 //

21 //

22 //

CONCLUSION

27. Based on the foregoing, I submit that there is probable cause to believe that JEREMY D. REEVES did commit bank fraud in violation of 18 U.S.C. § 1344 and aggravated identity theft in violation of 18 U.S.C. § 1028A(a)(1). I therefore respectfully request that the Court issue a complaint charging REEVES with those offenses and an arrest warrant for REEVES.



Adam L. Sale, Complainant
Postal Inspector, U.S. Postal
Inspection Service

The above agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit by telephone on this 13 day of April, 2023. Based on the Complaint and the sworn statement, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 13 day of April, 2023.



Hon. Theresa L. Fricke
United States Magistrate Judge